REMARKS

I. INTRODUCTION

In response to the Office Action dated January 12, 2004, the claims have not been amended. Claims 1-15 remain in the application. Re-consideration of the application is requested.

III. PRIOR ART REJECTIONS

In paragraph (29) of the Office Action, claim 1 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker, U.S. Patent No. 6,057,929 (Walker) and Derfler. In paragraph (38) of the Office Action, claim 2 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker, Derfler, and Bodin, U.S. Patent No. 6,604,106 (Bodin). In paragraph (43) of the Office Action, claim 3 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker, Derfler, and Bodin. In paragraph (48) of the Office Action, claim 4 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker, Derfler, and Guck, U.S. Patent No. 5,911,776 (Guck). In paragraph (53) of the Office Action, claim 5 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker and Derfler. In paragraph (57) of the Office Action, claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker an Derfler.

Applicants respectfully traverse these rejections.

Specifically, claim 1 was rejected as follows:

30. Claim 1 (amended) is an independent "computer implemented system" claim with 5 limitations, labeled by the Examiner for convenience.

31. [1] "a drawing file" is disclosed at Shumaker page 267 "AutoCAD drawing files are composed of vectors. A raster file defines objects by the location and color of the screen pixels. Rasterfiles are usually called bitmaps...You can work with raster files using the Image dialog box. Some of the most common raster files used in industry today are the following: .GIF (Graphics Interchange Format)... .PCX (Personal Computer Exchanged).... .TIF (Tagged Image File Format)... .BMP... .PCT... .JPG... .FLD or .FLI", and at page 277 "A vector file contains objects defined by XYZ coordinates. AutoCAD allows you to work with several different vector files using the Export Data and Import File dialog boxes. The most common is the AutoCAD drawing file (.dwg). Other vector file types are .dxf, .3ds, .wmf, and .sat".

32. [2] "an information extraction server component configured to provide information relating to the drawing file from a group of information comprising file size, date, and author" is disclosed at Schumaker page 268 Figure 13-2, particularly the button labeled "Details", and the description "Pick to view information about the image".

33. [3] "a search server component configured to provide a query engine that allows queries of the drawing file" is disclosed at Schumaker page 268 Figure 13-2, particularly the button labeled "Details, and the description "Pick to view information about the image".

34. Shumaker does not expressly disclose the remaining limitations.

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35. [4] "a conversion server component configured to transform the drawing file from one drawing file format to another drawing file format without accessing the application that created the drawing file" is disclosed at Walker at column 3 lines 46-62. "The file format of the drawing file 17 and the image characteristic data file 18 vary according to, and are determined by, the architect's drafting software and the printer system that generates the prints. To provide greater uniformity, the present invention initially converts the drawing file to a neutral data file format, as indicated by step 12, in FIG. 2. In the preferred embodiment, the neutral data file is created using the Page Masters Apprentice Software Program, although several other commercially available programs could be used to create a neutral data file. Accordingly, the system converts the drawing file format to the Page Masters Apprentice file format. Page Masters Apprentice files are denoted by a VIC file extension. While the .VIC extension is used on the preferred embodiment, the extension is arbitrary and may be easily changed, for example, .AEC could be used. The conversion of the drawing file to the neutral format is transparent to the reprographer."

36. [5] "a server comprising the information extraction server component, the search server component, and the conversion server component, wherein the server is configured to provide the information, query results, and the transformed drawing file across a network to a user using the graphical interface of a web browser" is disclosed by Derfler page 119 "four types of servers...One network strategy relies on a single powerful computer that is dedicated to providing all server functions for dozens or even hundreds of client computers on the network. This is known as *server-based networking*."

37. At the time the invention was made, it would have been obvious to a person of ordinary skill in the art to use Walker to modify Shumaker. One of ordinary skill in the art would have been motivated to do this "To provide greater uniformity" according to Walker column 3 line 49, and to implement Shumaker's page 347 "Internet" capabilities using Derfler's servers. Note that Shumaker's "Internet" capabilities are designed to "share drawing information with systems that do not have AutoCAD installed'"" thus implicitly teaching towards loading a single version of AutoCAD on Derfler's page 119 "application server", and thus supporting other systems that do not have AutoCAD installed. Derfler page 119 states "as you install more client computers that share the server's resources, a server-based network becomes more economical."

Independent claims 6 and 11 were rejected on the same grounds as claim 1.

Applicants traverse the above rejections for one or more of the following reasons:

(1) Neither Shumaker, Walker, Bodin, nor Derfler teach, disclose or suggest the claimed server components on a server;

(2) Neither Shumaker, Walker, Bodin, nor Derfler teach, disclose or suggest a server providing information relating to a drawing file across a network to a user using a graphical user interface of a web browser;

(3) Neither Shumaker, Walker, Bodin, nor Derfler teach, disclose or suggest a server providing query results from a query of a drawing file across a network to a user using a graphical user interface of a web browser; and

(4) Neither Shumaker, Walker, Bodin, nor Derfler teach, disclose or suggest a server providing a transformed drawing file across a network to a user using a graphical user interface of a web browser.

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Independent claims 1, 6, and 11 are generally directed to providing access to drawing information across a network. Specifically, the claims provide for a server that has at least three components: an information extraction server component, a search server component, and a conversion server component. The information extraction server component provides information relating to the drawing file such as the file size, date, and author. The search server component provides a query engine that allows queries of the drawing file (e.g., for various properties). The conversion server component transforms the drawing file from one format to another format without accessing the program that created the file. Lastly, the server is configured to provide/transmit the data from the various components (e.g., the information from the drawing file, the query results, and/or the transformed drawing file) across a network to a user using a graphical user interface of a web browser.

The cited references do not teach nor suggest these various elements of Applicants' independent claims. To teach the information extraction server component, the Office Action relied on Shumaker. However, Shumaker merely describes a standard AutoCAD program available from the assignee of the present invention. Namely, the version of AutoCAD described is simply a client-based program that is not operated on a network. The claim specifically provides that the component is an information extraction **server** component. No such server or server component is described, implicitly or explicitly, by Shumaker.

In response to the above argument the final Office Action provides:

> 18. Second, Applicant asserts that Shumaker's standard AutoCAD program is a client based program that is not operated on a network, and asserts "No such server or server component is described, implicitly or explicitly by Shumaker". However, Shumaker's prior art must be interpreted in the context of Shumaker's Chapter 15 is titled "AutoCAD and the Internet" and includes the paragraph "AutoCAD Release 14 now incorporates a set of tools called the Internet Utilities...Web Browser... you can now share drawing information with systems that do not have AutoCAD installed" at page 347. Thus, Shumaker clearly discloses networks, and implicitly discloses network servers. Said page 347 is supplied to the Applicant with this action.
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> ...
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> 21. Thus, one of ordinary skill in the art would interpret Shumaker's AutoCAD as capable of being a stand-alone program isolated in a single computer, and also as capable of being a "specific facility" (using IEEE terminology) in a server, and serving clients.

Applicants note that Shumaker's Chapter 15 is entitled, "AutoCAD and the Internet". However, page 347 of the chapter clearly indicates that the Internet Utilities merely provide the ability save a drawing in a format that can be viewed using a Web browser and placed on a Web site. Further, once placed on a web site, the drawing may be viewed using a web browser on systems that

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do not have AutoCAD installed. Thus, while the claims provide for an information extraction server component that is on a server containing multiple components, Shumaker merely provides the ability to place a drawing on a web site (that may be hosted by a server). The functionality provided by the server hosting the web site is unknown. In fact, Applicants submit that the functionality claimed and provided by a single server is not described whatsoever in any of the cited references. In view of the above, Applicants agree that Shumaker may implicitly disclose a network server. However, Shumaker's implicit disclosure is limited to the hosting of a web site and the drawings that are stored in a particular format by AutoCAD.

Again, the claims provide that the information extraction server component provides information relating to the drawing file. The information comprises file size, date, and author. While Shumaker indicates in Figure 13-2 the image name, status, size, type, date, and saved path, the information is provided as part of the AutoCAD client-based product. There is no description in Shumaker that indicates that this information is provided by a server component via a graphical user interface of a web browser as claimed. Instead, the image dialog box is a particular programmed window provided by the AutoCAD program on a client machine. There is no web browser, nor is there any network that is being displayed or used in Shumaker. In this regard, Shumaker completely fails to describe a server component providing such information through a web browser.

With respect to the suggestion that Shumaker's AutoCAD may be capable of being a specific facility in a server – there is no suggestion, implicit or explicit, Shumaker's AutoCAD is anything other than a single client-based drawing program. The definition provided (in the Office Action) indicates that a "server" is dedicated to providing specific facilities to other devices on a network. In other words, a server provides specific functionality and services to other devices. Applicants request a reference or description from anywhere within Shumaker that describes a server or AutoCAD providing the functionality as claimed.

The rejection states that Applicant has not asserted that Shumaker or Walker have any special characteristics which would make them difficult to implement as "special facility" on a server. Applicants hereby submit that neither Shumaker nor Walker were designed or implemented as a server-based program. To provide a server-based program, communications mechanisms and security mechanisms unique to the server/network-based environment must be provided. In this regard, to state that there is nothing unique about implementing a client-based application into a

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server-based application is completely without merit. That is similar to stating that Microsoft's™ exchange server or windows server has no unique functionality because it is merely a port from an old outlook program or Window's client-based operating system to a server. Server-based applications require additional functionality to provide the information over a network and to operate in a network-based environment. The current claims indicate such server components. Further, Shumaker does not provide such functionality and is not configured nor intended to provide such functionality.

To teach the search server component, the Office Action relies on Shumaker. Once again, the claims specifically provide that the component is a **server** component. However, as described above, Shumaker does not describe a networked or server-based program. Instead, Shumaker merely refers to the standard AutoCAD program. In this regard, Shumaker fails to teach this element as claimed.

The Office Action admits that Shumaker fails to teach the conversion server component aspect of the claims. Instead, the Office Action relies on Walker to teach this claim element. However, unlike the amended claims, Walker fails to describe a user using a graphical user interface of a web browser to view the transformed drawing file. The claims have been amended to provide for the use across a network of a graphical user interface of a web browser. Instead of providing the invention's flexible Internet and web browser based system, Walker describes the use of particular printing systems and printing hardware on individual reprographer locations (see col. 3, lines 11-30).

Further, Walker fails to describe a server or server component. Instead, Walker merely describes a peer-to-peer network with multiple reprographer sites merely transmitting drawing prints from one reprographer site to another reprographer site (see col. 2, line 66-col. 3, line 63 and FIGS. 1 and 2). The presently claimed invention provides for the server component performing the transformation and the server providing the information across a network to a web browser. No such server or server component performs the transformation in Walker. There is no discussion, implicit or explicit, of a server or server components whatsoever. In fact, an electronic search of Walker for the term "server" provides no results whatsoever. Without even mentioning the word server, Walker cannot possibly describe or render obvious a server or specific server components as claimed.

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In response to some of the above arguments, the final Office Action relies on Derfler to teach a server. Applicants are aware that server-based applications and server-based networking are available in the prior art. However, the mere description of a server without the functionality as claimed does not teach the invention. The claims provide for a server that contains specific components that provide specific functionality. Derfler fails to teach such components and such functionality.

The final Office Action submits that it would be obvious to implement Shumaker's page 347 "Internet" capabilities using Derfler's servers (see paragraph 37). Applicants agree that this statement may be true. However, Shumaker's "internet" capabilities provide for storing the files in an HTML format and then transferring the files to a web site where they may be accessed. Derfler's servers could potentially be used to host a web site and to store the HTML files created by Shumaker. Nonetheless, the combination of Shumaker with Derfler does not teach the invention as claimed. Neither Shumaker nor Derfler provide the specific components configured to perform the specific functionality on a single server component as claimed. Instead, the combination merely describes the transfer of HTML files to a server that hosts a web site. Such a combination does not even remotely describe, teach, or suggest, the invention as claimed. In this regard, Derfler merely states that there can be various types of servers including application servers and communication servers. Derfler further describes the various functionality that is provided by the various types of serves (e.g., good control, backup, and management of critical data). However, there is no description or suggestion that Shumaker should be reconfigured to provide the server functionality. Instead, Shumaker merely provides the ability to store files in a format capable of being viewed by a web browser and then a web site hosting those documents. Such a disclosure does not even remotely resemble the invention as claimed.

The final Office Action also states that "Shumaker's 'Internet' capabilities are designed to 'share drawing information with systems that do not have AutoCAD installed', thus implicitly teaching towards loading a single version of AutoCAD on Derfler's page 119 "application server", and thus supporting other systems that do not have AutoCAD installed. However, Applicants submit that while AutoCAD would like to share information with systems that do not have AutoCAD installed, the only manner in which they solve the solution is to store the images in HTML for access on a website. In this regard, AutoCAD is not intended to and cannot function as

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a server-based application or "application server" as claimed. To function as a server-based application as suggested in the Office Action, numerous changes would have to be implemented. Further, the mere porting of AutoCAD to a Derfler's server is not suggested by Shumaker or Derfler. The MPEP §706.02(j) provides that "there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings." There is no motivation or suggestion in Shumaker to make AutoCAD a server-based application. Further, there is no motivation or suggestion in Derfler to make a particular CAD based application or drawing program a server-based application. In addition, there was no knowledge generally available to one of ordinary skill in the art to modify or combine Shumaker with Derfler.

In addition, even if the motivation to combine is found, the combination of Shumaker with Derfler (and the other cited references) would not provide the functionality as claimed. For example, AutoCAD does not provide a query engine that allows queries of a drawing file (as claimed). Instead, Figure 13-2 merely lists properties of a raster image to be inserted or deleted. Such a display does not illustrate or describe a query engine whatsoever. Further, the various claimed server components existing on a single server are lacking in the cited references.

Original claim 2 provided for the use of active server pages that interacts with server components to obtain requested information using a graphical user interface of a web browser. The Office Action admits that both Walker and Shumaker fail to teach this claim. However, the Action relied on Bodin instead. However, Bodin merely describes the compression and delivery of web server content (see title). Applicants do not assert that Internet communications and active server pages are unique. Bodin merely teaches these standard Internet/web components. However, Applicants do assert that manner and method in which these particular components are utilized in the present claims are patentable. Specifically, the claims provide for an ASP that interacts with the specifically claimed server components to obtain requested information in the graphical user interface on the web browser. In this regard, the claims are directed towards a server/client/browser environment with the exchange/transmission of information. None of the cited references even remotely allude to such an invention.

The present invention provides the ability to provide access to drawing information on a network (see title and claims). To teach such a server environment, the Office Action merely

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provides a reference that describes a client-based AutoCAD program (Shumaker), a patent that describes the use of various different hardware programs on individual reprographic client machines (Walker), a patent that describes the standard delivery of web content (Bodin), and a patent that describes a server (Derfler). Such a teaching does not even remotely resemble the particularized method, system, and article of manufacture claimed wherein various specific server components perform various tasks and the results of those tasks are provided to a user operating a graphical user interface on a web browser. In view of the above, Applicants submit that the claimed invention is patentable over the cited references.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Shumaker, Walker, Bodin, Guck, and Derfler. In addition, Applicants' invention solves problems not recognized by Shumaker, Walker, Bodin, Guck, and Derfler.

Thus, Applicants submit that independent claims 1, 6, and 11 are allowable over Shumaker, Walker, Bodin, Guck, and Derfler. Further, dependent claims 2-5, 7-10, and 12-15 are submitted to be allowable over Shumaker, Walker, Bodin, Guck, and Derfler in the same manner, because they are dependent on independent claims 1, 6, and 11, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-5, 7-10, and 12-15 recite additional novel elements not shown by Shumaker, Walker, Bodin, Guck, and Derfler.

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IV. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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